

1 Before the
2 Federal communications Commission
3 Washington, DC 20554
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5 Amendment of Part 97 of the Commission's)
6 Rules to Facilitate Use in the Amateur) RM-11625
7 Radio Service of Single Slot Time)
8 Division Multiple Access Telephony and)
9 Data Emissions)

10
11 REPLY TO THE COMMENTS OF THE CODEC2 PROJECT
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13 In the CODEC2 comments, three alternatives are offered in place of the ARRL-proposed
14 tweak to permit TMDA on UHF frequencies. Those alternatives were dubbed "small",
15 "medium", and "large".
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17 I would like to express my support for the "small" option suggested. The changes
18 appear to expand the authorized emission designations in such a way as to proactively
19 prevent the need for further tweaks akin to those requested by the ARRL, thereby
20 removing an obstacle to experimentation in the amateur radio service. They seem to
21 address some of the concerns I expressed in my previously-submitted comment in a more
22 elegant, and generalized way.
23

24 I am not opposed to the "medium" option suggested. The "medium" option amounts to a
25 shift from regulation by emission type to regulation by bandwidth, a change that would
26 somewhat harmonize U.S. regulations with those of other countries, neatly avoiding
27 questions about how various modes fit within the current regulatory scheme. However,
28 I do think that the "medium" option would be such a major change in our regulations
29 that the subject would be better addressed in a separate proceeding, rather than as
30 part of the omnibus package of adjustments the Commission is now considering. Thus, I
31 would prefer to see "small" now, and possibly "medium" later.
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1 I am opposed to pursuing the "large" option at this time. I am actually neutral on
2 the idea as presented, but I would prefer to see significant discussion on the idea if
3 it were considered, and I would rather not see some of the other changes proposed
4 delayed to accommodate that discussion.

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6 Dated this 16th day of October, 2013

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